

1 ADAM PAUL LAXALT
Attorney General
2 BENJAMIN R. JOHNSON, Bar No. 10632
Deputy Attorney General
3 State of Nevada
Bureau of Litigation
4 Public Safety Division
100 N. Carson Street
5 Carson City, NV 89701-4717
Tel: (775) 684-1254
6 E-mail: BJohnson@ag.nv.gov

7 *Attorneys for Defendants*
Romeo Aranas, Isidro Baca,
8 *Candis Brockway, Sheryl Foster,*
Jonathan Perry, and Ashley Randolph
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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 CHRISTOPHER A. JONES,
13 Plaintiff,

14 vs.

15 BRUCE BANNISTER, et al.,
16 Defendants.

Case No. 3:16-cv-00399-MMD-VPC

**DEFENDANTS' MOTION FOR EXTENSION
OF TIME TO SERVE DISCOVERY
RESPONSES**

17 Defendants, Romeo Aranas, Isidro Baca, Candis Brockway, Sheryl Foster, Jonathan Perry, and
18 Ashley Randolph (Defendants), by and through counsel, Adam Paul Laxalt, Attorney General of the
19 State of Nevada, and Benjamin R. Johnson, Deputy Attorney General, hereby submit this Motion for
20 Extension of Time to Serve Discovery Responses. This Motion is based on Federal Rule of Civil
21 Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and
22 pleadings on file in this action.

23 **MEMORANDUM OF POINTS AND AUTHORITIES**

24 **I. RELEVANT PROCEDURAL HISTORY**

25 On November 8, 2017, Plaintiff served discovery requests upon Defendants, including both
26 interrogatories and requests for admission.

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1 **II. ARGUMENT**

2 Defendants respectfully request a fourteen (14) day extension of time to serve discovery
3 responses. Counsel for Defendants is confronted with numerous competing deadlines and a high
4 workload due to staffing changes in the Office of the Attorney General. Furthermore, defense counsel
5 is currently in trial in another matter before this Court, *Cross v. Jaeger*, 3:13-cv-00433-MMD-WGC
6 (see (ECF No. 518)). However, such obstacles are currently being resolved, trial in the other case is
7 drawing to a conclusion, and the requested extension of time will afford Defendants adequate time to
8 serve discovery responses in this matter.

9 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

10 When an act may or must be done within a specified time, the court may,
11 for good cause, extend the time: (A) with or without motion or notice if
12 the court acts, or if a request is made, before the original time or its
extension expires; or (B) on motion made after the time has expired if the
party failed to act because of excusable neglect.

13 Defendants' request is timely and its limited nature will not hinder or prejudice Plaintiff's case,
14 but will allow for thorough responses to Plaintiff's discovery requests. Defendants' request is made in
15 good faith and not to delay or hinder proceedings in this matter. The requested fourteen (14) day
16 extension of time will permit Defendants time to adequately research and respond to Plaintiff's
17 discovery requests. Defendants assert that the requisite good cause is present to warrant the requested
18 extension of time.

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1 **III. CONCLUSION**

2 For the foregoing reasons, Defendants respectfully request a fourteen (14) day extension of time
3 to serve pending discovery responses, with a new deadline for service through Friday, December 22,
4 2017.

5 DATED this 8th day of December, 2017.

6 ADAM PAUL LAXALT
7 Attorney General

8 By:


BENJAMIN R. JOHNSON
Deputy Attorney General
State of Nevada
Bureau of Litigation
Public Safety Division
Attorneys for Defendants

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14 **IT IS SO ORDERED.**


U.S. MAGISTRATE JUDGE


16 DATED: December 27, 2017
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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 8th day of December, 2017, I caused to be served a copy of the foregoing, **DEFENDANTS' MOTION FOR EXTENSION OF TIME TO SERVE DISCOVERY RESPONSES**, by U.S.

District Court CM/CFE Electronic Filing on:

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